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9 *Attorney for Defendant*

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE**
12 **NORTHERN MARIANA ISLANDS**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 SHI, GUI LIN, et. al.,

17 Defendants.

CRIMINAL CASE NO 07-00017

**STIPULATED EXTENSION OF
TIME TO FILE PRE-TRIAL
MOTIONS**


18 This matter came before the Court for arraignment on June 01, 2007. As a result of this
19 hearing the Court entered an Order setting the deadline for filing pre-trial motions to June 15, 2007.


20 Counsel for Defendant Shi has made a demand for discovery since June 08, 2007, however,
21 he is advised by AUSA O'Malley that the discovery has been delayed due to the number of cases
22 being processed at the same time. Discovery has been promised by no later than the end of this
23 week i.e. June 15, 2007.

24 Therefore, for the reasons stated herein and in the attached Declaration of Counsel, which
25 is incorporated herein by this reference, the parties propose that the deadline for filing pre-trial
26 motions be June 22, 2007.

27 So stipulated this 13th day of June, 2007.
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Eric O'Malley, Assistant U.S. Attorney
Attorney for the United States


Joey P. San Nicolas, Attorney for
Defendant Shi

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9 *Attorney for Defendant*

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11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE**
13 **NORTHERN MARIANA ISLANDS**

14 **UNITED STATES OF AMERICA,**

15 **Plaintiff,**

16 **vs.**

17 **SHI, GUI LIN, et. al.,**

18 **Defendants.**

CRIMINAL CASE NO 07-00017

**DECLARATION IN SUPPORT
OF STIPULATED EXTENSION**

19 I, JOEY P. SAN NICOLAS, declare the following:


- 20 1. I am licensed to practice before this Court; I am over the age of majority and
21 competent to testify as to the matters contained herein.
- 22 2. I am the court appointed attorney for the above named Defendant.
- 23 3. On June 08, 2007 I sent a letter, via fax transmission to the U.S. Attorney's Office
24 requesting discovery in the above matter.
- 25 4. On June 11, 2007 I called AUSA O' Malley to follow up my written request for
26 discovery. Mr. O' Malley advised me that discovery was not available since there
27 were several defendants whose cases are being processed concurrently.
- 28 5. However, the current deadline for filing pre-trial motions, as set by the Court in its
June 01, 2007 Order is June 15, 2007.

1 6. There will be inadequate time for counsel to confer with his client regarding the
2 discovery.

3 7. There will also be inadequate time for counsel to prepare and file any pre-trial
4 motions counsel deems appropriate, if the discovery is provided on the eve or the
5 day the motions must be filed.

6 8. Wherefore, the parties through their respective attorneys, have agreed that the
7 deadline to file such motions should b extended for one week to June 22, 2007.

8 I declare under penalty of perjury that the foregoing statements are true and correct to the
9 best of my knowledge and belief and that this Declaration was executed on 13th day of June, 2007.

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13 Joey P. San Nicolas, Attorney for
14 Defendant Shi
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